

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AYANNA ROSENBERG, individually, and on
behalf of all those similarly situated,

Plaintiff,

v.

CCS COMMERCIAL, L.L.C., (d/b/a Credit
Collection Services Commercial), and
PROGRESSIVE DIRECT INSURANCE
COMPANY,

Defendants.

Case No. 2:17-cv-00476-MJP

**STIPULATED MOTION AND ORDER
AMENDING SUMMARY JUDGMENT
SCHEDULE**

**NOTE ON MOTION CALENDAR:
JUNE 13, 2018**

Pursuant to LCR 7(d)(1), LCR 10(g), and the Court's Chamber Procedures, plaintiff Ayanna Rosenberg, defendant CCS Commercial, LLC ("CCS"), and defendant Progressive Direct Insurance Company ("Progressive"), by and through their counsel, hereby stipulate and move for a consolidated briefing schedule on their cross motions for summary judgment under LCR 7(k).

STIPULATED MOTION

The parties agree and stipulate as follows:

Plaintiff filed a motion for partial summary judgment on May 31, 2018, with a noting date of June 22, 2018. Progressive filed a motion for summary judgment on June 12, 2018, with a noting date of July 6, 2018.

1 Pursuant to LCR 7(k), the parties have agreed to modify the current briefing schedule for
2 their cross motions for summary judgment, and to allow plaintiff to combine her reply and response
3 memoranda into a single extra-length brief. Accordingly, the parties agree and stipulate that good
4 cause exists to modify the briefing schedule as follows:

5 Progressive and CCS will file their responses to plaintiff's motion for partial summary
6 judgment, which will not exceed 24 pages each, on **June 20, 2018**.

7 Plaintiff will file a combined response to Progressive's motion for summary judgment and
8 reply in support of plaintiff's partial motion for summary judgment, which will not exceed 48 pages,
9 on **July 2, 2018**.

10 Progressive will file its reply in support of its motion for summary judgment (limited to
11 arguments I, II, and IV in Progressive's motion), which will not exceed 12 pages, on **July 6, 2018**.

12 **STIPULATED and AGREED:**

13 Dated this 13th day of June, 2018

14 TOUSLEY BRAIN STEPHENS PLLC

15 By: /s/ Chase Alvord

16 Chase Alvord, WSBA No. 26080
17 Email: calvord@tousley.com
18 James M. Bulthuis, WSBA No. 44089
Email: JBulthuis@Tousley.com

19 IDE LAW OFFICE

Matthew James Ide, WSBA No. 26002
Email: mjide@yahoo.com

20 *Attorney for Plaintiff Ayanna Rosenberg,*
21 *individually, and on Behalf of all those*
22 *similarly situated*

BULLIVANT HOUSER BAILEY PC

By: /s/ Matthew J. Sekits

Matthew J. Sekits, WSBA #26175
E-mail: matthew.sekits@bullivant.com
Holly D. Brauchli, WSBA #44814
E-mail: holly.brauchli@bullivant.com

Attorneys for Defendant
CCS Commercial, LLC

HOLLAND & KNIGHT

By: /s/ Kristin Asai

J. Matthew Donohue, WSBA No. 52455
Email: Matt.Donohue@hklaw.com
Shannon Armstrong, WSBA No. 45947
Email: Shannon.Armstrong@hklaw.com
Kristin Asai, WSBA No. 49511
Email: Kristin.Asai@hklaw.com

Attorneys for Defendant Progressive Direct
Insurance Company

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DATED this 14th day of June, 2018.

Wassily Kandinsky

The Honorable Marsha J. Pechman
United States Senior District Court Judge

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing STIPULATED MOTION AND [PROPOSED] ORDER AMENDING SUMMARY JUDGMENT SCHEDULE to be served on the following person[s]:

Chase Christian Alvord
James M. Bulthuis
Tousely Brain Stephens
1700 Seventh Avenue, Suite 2200
Seattle, WA 98101
Calvord@tousley.com
Jbulthuis@tousley.com

Matthew J. Sekits
Holly D. Brauchli
Bullivant Houser Bailey PC
1700 Seventh Avenue, Ste. 1810
Seattle, WA 98101
matthew.sekits@bullivant.com
holly.brauchli@bullivant.com

Matthew James Ide
Ide Law Office
7900 SE 28th St., Suite 500
Mercer Island, WA 98040
Mjide@yahoo.com

Attorneys for Defendant CCS Commercial LLC

Attorneys for Plaintiff

by causing the document to be delivered by the following indicated method or methods:

- ☒ by CM/ECF electronically mailed notice from the Court on the date set forth below.
- ☐ by mailing full, true and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or attorneys, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.
- ☐ by causing full, true, and correct copies thereof to be hand-delivered to the parties and/or their attorneys at their last-known office addresses listed above on the date set forth below.
- ☐ by sending full, true, and correct copies thereof, via overnight courier in sealed, prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or their attorneys, on the date set forth below.
- ☐ by faxing full, true, and correct copies thereof to the fax machines which are the last-known fax numbers for the parties' and/or attorneys' offices, on the date set forth below.

DATED June 13, 2018.

/s/ Kristin M. Asai
Kristin M. Asai